



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

July 17, 2019

Ford Motor Company
c/o Mr. Todd Walton
290 Town Center Drive, Suite 800
Dearborn, Michigan 48126

Dear Mr. Walton:

SUBJECT: 2nd Quarter, 2019 Vapor Intrusion Assessment Data Packages:
12400 Belden Court; 11675 Belden Court
Ford - Livonia Transmission Plant, 36200 Plymouth Road, Wayne County
Site ID No.: 82002970

The Department of Environment, Great Lakes, and Energy (EGLE), Remediation and Redevelopment Division has reviewed the 2nd Quarter 2019 "Vapor Intrusion Assessment Data Package" reports for 12400 Belden Court and 11675 Belden Court, both dated May 27, 2019, and has the following comments to be addressed.

12400 Belden Court:

There are multiple detections of trans-1,2-Dichloroethene (DCE) ranging from 6,600 to 14,000 $\mu\text{g}/\text{m}^3$ and detections of Trichloroethene (TCE) ranging from 4,900 to 10,000 $\mu\text{g}/\text{m}^3$ in indoor air samples which exceeds the Time-Sensitive Recommended Interim Action Screening Levels (TS-RIASL). Sub-slab concentrations are as high as 2,300 $\mu\text{g}/\text{m}^3$ for DCE and 2,900 $\mu\text{g}/\text{m}^3$ for TCE, in SSMP-11. The sub-slab concentrations are lower than the indoor air concentrations and the chemical inventory documented numerous chemicals used at the property including TCE, therefore, it appears there is a source of volatiles used within the business; however, due to the sub-slab soil-gas concentrations exceeding the site-specific non-residential criteria, they may be a source of the indoor air DCE and TCE exceedances and pose a risk for vapor intrusion. Ford is required to assess and address this potential vapor intrusion and identify the actions that will be undertaken at this property by July 25, 2019.

11675 Belden Court:

TCE was detected in all 5 recent indoor air samples with concentrations ranging from 3.8 to 14 $\mu\text{g}/\text{m}^3$ which exceeds the TS-RIASL. TCE in sub-slab soil gas was detected at 250 $\mu\text{g}/\text{m}^3$. Sources of chemicals such as TCE were removed prior to and during the sampling event. The sub-slab soil gas concentration and indoor air concentrations exceed the site specific non-residential criteria and the sub-slab soil gas is present at higher concentrations than the indoor air detections; it appears that the TCE detected in indoor air may be attributable to the TCE present in the sub-slab soil gas. Therefore,

Ford is required to assess and address this vapor intrusion and identify the actions that will be undertaken at this property by July 25, 2019.

In accordance with Section 6.1(b), Ford shall identify and address conditions that require response activities necessary to mitigate any immediate public health risks, within the Area of Concern, resulting from volatilization to indoor air of Chemicals of Concern, from all environmental media. EGLE asks that Ford further investigate, evaluate, and should evaluation indicate that contamination is related to or comingled with Ford's plume, Ford shall take immediate action to address the soil-gas and indoor air exceedances at 11675 Belden Court and 12400 Belden Court and identify the expedited schedule these actions will be undertaken in the submittal due to EGLE on July 25, 2019. Please be advised that EGLE has also communicated the concerns associated with these properties with the Michigan Department of Health and Human Services (MDHHS) and will continue to be in contact with MDHHS regarding indoor air concentrations.

If you have any questions or concerns, please contact Brandon Alger at algerb@michigan.gov; 586-623-2839, or Beth Vens at vensb@michigan.gov; 586-484-1030.

Sincerely,



Paul Owens, District Supervisor
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Remediation and Redevelopment Division
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cc: Senator Dayna Polehanki
Representative Laurie Pohutsky
Mr. Paul Bernier, City of Livonia
Ms. Maureen Franklin, Wayne County DNVCW
Mr. Shawn Collins, The Collins Law Firm, PC
Ms. Alexandra Rafalski, DHHS
Ms. Beth Vens, EGLE
Mr. Brandon Alger, EGLE